Puerto Rico Digital Operators Group Services
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Federal Communications Commission
45 L Street NE
Washington, DC 20554

Subject: Request for Removal of 56 Kilobaud Symbol Rate Limitation on VHF/UHF Amateur Radio Bands
GN Docket No. 25-133

Dear FCC Commissioners,

I am writing to formally request the removal or modification of the 56 kilobaud (kb) symbol rate limitation on VHF and UHF amateur radio bands, as currently outlined in 47 CFR § 97.307(f)(5). Given the rapid advancements in digital communication technologies, this restriction has become an unnecessary barrier to innovation, spectrum efficiency, and modern amateur radio experimentation.

Reasons for Removing the Symbol Rate Restriction

Outdated Restriction in a Modern Digital Era
When the 56-kbps limit was implemented, digital modulation techniques were still developing. Today's software-defined radio (SDR) technologies, along with advanced error correction and adaptive bandwidth management, allow significantly higher data rates without causing increased spectral congestion or interference.

Unfair Limitation Compared to Other Services
Commercial and experimental wireless services operate under bandwidth-based regulations rather than outdated symbol rate restrictions. Services such as Wi-Fi, cellular, and fixed wireless already enjoy higher data rates and more efficient use of spectrum.

Encouraging Innovation and Emergency Communications
Amateur radio operators have a long history of technological advancement. Removing the baud rate restriction would empower operators to develop and test cutting-edge digital modes, benefiting emergency communications, high-speed data transmission, and remote sensing. Groups such as ARES and RACES rely on amateur digital communications for disaster response, yet the 56-kbps cap severely limits real-time data exchange, including video and telemetry during emergencies.

More Efficient Use of Spectrum
Modern digital modes—including OFDM, QAM, and adaptive coding—achieve high data throughput within narrow bandwidths. The current symbol rate limit does not effectively manage bandwidth, making it an arbitrary and inefficient constraint.

Proposed Regulatory Change

I propose the FCC modernize Part 97 regulations by:

- **Eliminating the 56 kbps symbol rate restriction entirely**, or

- **Adopting a bandwidth-based framework** that allows higher symbol rates while ensuring compliance with existing maximum bandwidth limits (e.g., 100 kHz on VHF/UHF), and
- **Aligning amateur digital operation rules with those used for commercial and experimental services**, allowing flexibility in modulation techniques.

Conclusion

Removing the 56 kbps symbol rate limitation is an important step in modernizing amateur radio regulation. It will encourage innovation, support robust emergency communication capabilities, and enable experimentation with high-speed digital technologies.

I urge the Commission to consider this change under GN Docket No. 25-133 and support regulatory updates that reflect today's technological capabilities and communication needs.

Thank you for your time and consideration. I look forward to your response.

Sincerely,

Puerto Rico Digital Operators Group Services
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